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November 19, 2015

VIA E-MAIL TRANSMISSION AND ECF FILING

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Update on Related Proceedings

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“New GM”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM. Specifically,

1. On November 17, 2015, Judge Furman issued an Endorsed Order in MDL 2543 in connection with the proposed agenda submitted by New GM and Lead and Liaison Counsel (“Joint Agenda Letter”)¹ for the upcoming status conference scheduled to be held tomorrow, November 20, 2015 (“Endorsed Order”). A copy of the Endorsed Order is attached hereto as **Exhibit “1.”**
2. On November 18, 2015 and November 19, 2015, the People of the State of California and the State of Arizona, respectively, each filed with the United States Court of Appeals for the Second Circuit (“Second Circuit”) a stipulation withdrawing their appeal (collectively, the “Stipulations”). Today, November 19, 2015, the Second Circuit

¹ A copy of the Joint Agenda letter was previously provided to the Court in an update letter dated November 16, 2015 [ECF No. 13539].

Honorable Robert E. Gerber
November 19, 2015
Page 2

entered an order approving the Stipulation filed by the People of the State of California (“California Order”), and subsequently terminated the People of the State of California as a participant in the Direct Appeal. An order approving the Stipulation filed by the State of Arizona is expected to be entered shortly by the Second Circuit. The Stipulations and the California Order are attached hereto as **Exhibits “2” through “4.”**

3. Today, November 19, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“Joint Letter”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of the Joint Letter, without exhibits,² is attached hereto as **Exhibit “5”**.

Respectfully submitted,

/s/ Scott Davidson

Scott Davidson

AJS/sd

Encl.

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² There are 21 exhibits annexed to the Joint Letter, many of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.